

REMARKS

Reconsideration of the present application is respectfully requested. No claims have been amended, canceled, or added. Accordingly, claims 1-43 remain pending in the present application.

Claims 1-43 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 5,652,412 to Lazzouni et al. ("Lazzouni") in view of U.S. Patent No. 6,330,976 to Dymetman et al. ("Dymetman"). Claim 1 recites, in part, the feature of "detecting...an associated portion of an address pattern included on the surface, wherein a position of the reading sensor relative to the address pattern can be determined from the detected portion of the address pattern." Similarly, claim 15 recites, in part, the features of determining "a position relative to the address pattern from an examination of only a portion of the address pattern" and "an electronic reading device including a reading sensor for substantially simultaneously detecting at least a portion of the printed information and a corresponding portion of the address pattern." Claim 29 recites, in part, the features of "detecting a portion of an address pattern depicted on the surface" and "identifying a position of the detected portion of the image using the corresponding detected portion of the address pattern."

As noted at page 3 of the Office Action, it is acknowledged that Lazzouni does not explicitly specify detecting a portion of an address pattern included on the surface. As such, Lazzouni also cannot teach determining a position *using the detected portion of the address pattern* as recited in the independent claims. It is asserted that Dymetman teaches the feature of detecting a portion of an address pattern included on the surface. Applicants respectfully disagree. Instead, Dymetman teaches that localization identifies a cell zone on the page, not a point on the page. *See* Dymetman, col. 13, lines 18-19. Applicants respectfully submit that the location information of Dymetman identifies the location of a cell on a page, not a position on an address pattern as required by the independent claims of the present application. Dymetman teaches that a complete cell must be within the region of the page from whose image a page-identifier and location code are to be obtained. *Less than a complete cell does not contain sufficient information.* *See* Dymetman, col. 13, lines 20-24. Therefore, the image of a complete cell must be detected in order to determine a

page identifier and a location code associated with a particular cell. In addition, Applicants respectfully submit that there is no teaching or suggestion by Dymetman that the markings in each of the plurality of cells collectively form an address pattern on the page. Applicants submit that Dymetman does not teach or suggest that a position on the address pattern is identified from an examination of a portion of the address pattern as recited in claims 1, 15, and 29. As such, Dymetman does not remedy the deficiencies of Lazzouni and Applicants respectfully submit that claims 1, 15, and 29 distinguish over the combination of Lazzouni and Dymetman. Applicants request that the §103 rejection of claims 1, 15, and 29 be withdrawn.

Claims 2-14, 16-28, and 30-43 are either directly or indirectly dependent from one of claims 1, 15, and 29 and should distinguish over the combination of Lazzouni and Dymetman for at least the same reasons as stated above. Applicants respectfully request that the §103 rejection of claims 2-14, 16-28, and 30-43 be withdrawn.

In view of the above amendment, applicant believes the pending application is in condition for allowance.

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Respectfully submitted,

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